

EXHIBIT 1

Original - Court
1st Copy- Defendant2nd Copy - Plaintiff
3rd Copy -Return**STATE OF MICHIGAN
THIRD JUDICIAL CIRCUIT
WAYNE COUNTY****SUMMONS****CASE NO.
25-008288-NO
Hon.Catherine L. Heise**

Court telephone no.: 313-224-5225

Plaintiff's name(s), address(es), and telephone no(s)
DISPENSA, CHRISTOPHER FRANCIS

v

Defendant's name(s), address(es), and telephone no(s).
ALL ELITE WRESTLINGPlaintiff's attorney, bar no., address, and telephone no
Thomas William James 68563
2000 Town Center Blvd, Ste 1300
Southfield, MI 48075**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.**Domestic Relations Case**

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☐ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in ☐ this court, ☐ _____ Court, where it was given case number _____ and assigned to Judge _____.
- The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date
5/30/2025Expiration date*
8/29/2025Court clerk
Ibrahim Islam

Cathy M. Garrett- Wayne County Clerk.

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

MC 01 (3/23)

SUMMONS

MCR 1.109(D), MCR 2.102(B), MCR 2.103, MCR 2.104, MCR 2.105



<p align="center">SUMMONS</p> <p>Case No. : 25-008288-NO</p>
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PROOF OF SERVICE

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE
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- ☐ I served ☐ personally ☐ by registered or certified mail , return receipt requested, and delivery restricted to the addressee(copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:
- ☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled \$	Fee \$	
Incorrect address fee \$	Miles traveled \$	Fee \$	Total fee \$

Signature

Name (type or print)

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of the summons and complaint, together with

Attachments (if any) _____ on _____ Date and time

_____ on behalf of _____

Signature

Original - Court 1st Copy- Defendant		2nd Copy - Plaintiff 3rd Copy -Return
STATE OF MICHIGAN THIRD JUDICIAL CIRCUIT WAYNE COUNTY	SUMMONS	CASE NO. 25-008288-NO Hon.Catherine L. Heise

Court telephone no.: 313-224-5225

Plaintiff's name(s), address(es), and telephone no(s) DISPENSA, CHRISTOPHER FRANCIS	v	Defendant's name(s), address(es), and telephone no(s). GOOD, JONATHAN DAVID
Plaintiff's attorney, bar no., address, and telephone no Thomas William James 68563 2000 Town Center Blvd, Ste 1300 Southfield, MI 48075		

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SUMMONS

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SUMMONS

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SUMMONS
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Incorrect address fee \$	Miles traveled \$	Fee \$	Total fee \$

Signature

Name (type or print)

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of the summons and complaint, together with

_____, on _____
Attachments (if any) Date and time

_____, on behalf of _____
Signature

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

CHRISTOPHER FRANCIS DISPENSA,

Plaintiff,

Case No: 25 -
Hon.

- NO

vs.

ALL ELITE WRESTLING,
a Florida corporation,
and
JONATHAN DAVID GOOD,
a.k.a. "JON MOXLEY",
an individual;
Jointly and Severally.

Defendants.

THOMAS W. JAMES (P68563)
ROBERT M. RAITT (P47017)
RAITT LAW, PLLC
Attorneys for Plaintiff
2000 Town Center, Suite 1300
Southfield, MI 48075
(248) 353-1000 | (248) 617-2318 (fax)
tjames@raittlegal.com
braitt@raittlegal.com
crichards@raittlegal.com (asst.)

COMPLAINT

There is no other pending or resolved civil action arising out of the transaction or occurrence alleged in the complaint. MCR 1.109(D)(2)(a)(i).



THOMAS W. JAMES

Plaintiff, CHRISTOPHER FRANCIS DISPENZA (“DISPENSA”), through his attorneys, RAITT LAW, PLLC, states the following supporting this Complaint:

1. Plaintiff, CHRISTOPHER FRANCIS DISPENZA (“Dispensa”), at all times relevant, was a resident of the City of St. Cloud, County of Osceola, and State of Florida.

2. Defendant, ALL-ELITE WRESTLING (“AEW”), is an interstate corporation operating with its principal place of business in the City of Jacksonville, County of Duval, state of Florida and does regular and consistent business in the state of Michigan, specifically in the county of Wayne.

3. Defendant, JONATHAN DAVID GOOD, a/k/a “JON MOXLEY” (Hereinafter “MOXLEY”), at all times relevant, was a resident of the City of Cincinnati, County of Hamilton, and State of Ohio.

4. At all times relevant, Defendant AEW was conducting business in Michigan; specifically in the Little Caesars Arena in the city of Detroit, County of Wayne, state of Michigan.

5. Defendant AEW hosts such events in Michigan in a continuous and systematic manner as a part of its business.

6. Defendant MOXLEY, at all relevant times, was employed by Defendant AEW, an agent or otherwise under the control and direction of Defendant AEW.

7. As part of his employment, agency and/or contractual obligations, Defendant MOXLEY would travel interstate and perform at various locations; such as he was doing on the night of May 10, 2023 at the Little Caesars Arena in Detroit Michigan.

8. Venue is proper in Wayne County under MCL 600.1629(1)(a)(i) because the injury occurred in Wayne County and the Defendant AEW conducts significant and consistent business by promoting, forming, and holding events in Wayne County as well as maintaining other connections to Wayne County.

9. The amount in controversy exceeds Twenty-Five Thousand (\$25,000.00) Dollars.

FACTUAL ALLEGATIONS

10. On or about May 10, 2023, Plaintiff was a business invitee of Little Caesars Arena in Detroit Michigan as a production team member for the event Defendant AEW was putting on within the arena.

11. Plaintiff was tasked with holding a screwdriver for Defendant MOXLEY to use during the performance.

12. Plaintiff was not a performer and was not warned of spontaneously becoming a performer.

13. Plaintiff held the screwdriver for Defendant MOXLEY to take from his hand, as intended and scripted.

14. Upon receiving the item and without warning, explanation or prior discussion, Defendant MOXLEY unexpectedly deviated from the planned script by placing his hands on Plaintiff's face and shoulder and violently shoving Plaintiff to the ground.

15. Plaintiff sustain extensive injuries as a result of this violent and unscripted assault, ultimately culminating in a surgical procedures of CERVICAL SPINE SURGERY, SHOULDER SURGERY plus other serious injuries that necessitate significant medical treatment.

COUNT I
NEGLIGENT HIRING, TRAINING, SUPERVISION & RETENTION
AS TO DEFENDANT AEW

16. Plaintiff realleges, reaffirms and incorporates by reference all allegations in paragraphs 1-15.

17. Defendant AEW owed Plaintiff the duties below, including but not limited to:

- a. The duty to hire, train, supervise and discipline competent employees and agents within Defendant's company or productions;

- b. The duty to train and supervise employees to ensure the safety of independent contractors – like Plaintiff – and others on the premises;
- c. The duty to ensure performances are conducted in a manner that is safe for the performers, the production crew, and the general audience;
- d. The duty to exert reasonable control over its employees, agents, and/or contracted individuals to ensure the safety of other performers, production crew, and the general audience;
- e. The duty to perform basic background checks on employees, agents and/or contracted individuals;
- f. The duty to avoid hiring individuals with documented criminal histories involving assault, battery and other physical offenses to people or property as well as a propensity for being otherwise uncontrollable; and
- g. The duty to hire, train, supervise and discipline employees, agents and/or contracted individuals to ensure their adherence to AEW policies and procedures, the law and public safety.

18. Upon information and belief, Defendant MOXLEY had a history of disciplinary issues before this incident involving other people while under Defendant AEW's employ, agency and/or contractual relationship.

19. The past disciplinary offenses by Defendant MOXLEY include a documented history of unpredictability as well as a lack of control by Defendant AEW, all of which were known or should have been known to Defendant AEW at the time of this assault.

20. As a proximate cause of Defendant AEW's negligent hiring, training, supervision and retention of its employees, agents and/or contracted individuals, Plaintiff was seriously injured.

21. Defendant AEW's negligence was a proximate cause of Plaintiff being seriously injured, suffering a CERVICAL FUSION SURGERY, SHOULDER SURGERY, back, , radiculopathy, plus other injuries to other parts of his body, currently known or unknown, some or all of which interferes with his enjoyment of life and experiencing great pain and suffering.

22. Defendant AEW's negligence was a proximate cause of Plaintiff sustaining a permanent serious disfigurement in the form of a surgical scar on his neck which is unsightly and embarrassing.

WHEREFORE, Plaintiff now claims judgment for whatever amount he is found to be entitled, plus court costs, attorney fees and interest from the date of filing this Complaint.

COUNT II
CIVIL ASSAULT & BATTERY AS TO DEFENDANT MOXLEY

Plaintiff DISPENSA adds Count II as follows:

23. Plaintiff realleges, reaffirms and incorporates by reference all allegations in paragraphs 1-22.

24. Defendant MOXLEY's unscripted actions and actions described above caused Plaintiff to reasonably believe that harmful or offensive contact was imminent; however, Plaintiff.

25. Defendant MOXLEY's unscripted actions and movements were overt, such that any reasonable person would have felt apprehension of harmful or offensive contact.

26. Defendant MOXLEY assault and battery Plaintiff by deviating from the planned script and violently and unexpectedly shoving Plaintiff to the ground.

27. Defendant MOXLEY's actions show a clear intent to harm Plaintiff or at a minimum a complete disregard for whether harm was a result.

28. Defendant MOXLEY's actions did harm Plaintiff, the extent of which is still unknown, as Plaintiff continues to have physical issues related to the incident.

WHEREFORE, Plaintiff now claims judgment for whatever amount he is found to be entitled including but not limited to Exemplary Damages, plus court costs, attorney fees and interest from the date of filing this Complaint.

COUNT III
GENERAL NEGLIGENCE
AS TO DEFENDANT MOXLEY AND DEFENDANT AEW

Plaintiff DISPENSA adds Count III as follows:

29. Plaintiff realleges, reaffirms and incorporates by reference all allegations in paragraphs 1-28.

30. As a working member of the production crew, Defendant AEW and Defendant MOXLEY each owed Plaintiff a general duty of taking reasonable care for his safety.

31. Specifically, Defendant AEW was required to ensure that its performance was safe, its performers were doing their jobs in a manner such as to not expose production crew and the general public from unreasonable risks of injury, to supervise and ensure the safety of all participants, and to prevent foreseeable misconduct by its performers which could jeopardize the safety of any crew members or members of the general public.

32. Moreover, Defendant MOXLEY was not granted special permission to assault, batter, or otherwise touch Plaintiff. The script called only for Defendant MOXLEY to take the screwdriver which Plaintiff was holding for him.

33. Defendants each breached these duties when Defendant MOXLEY deviated, without warning, from the script and violently shoved Plaintiff to the ground.

34. As a direct result of these breaches, Plaintiff suffered damages; the extent of which is yet unknown as his medical treatment continues.

WHEREFORE, Plaintiff now claims judgment for whatever amount he is found to be entitled, plus court costs, attorney fees and interest from the date of filing this Complaint.

COUNT IV
GROSS NEGLIGENCE
AS TO DEFENDANT MOXLEY AND DEFENDANT AEW

Plaintiff DISPENSA adds Count IV as follows:

35. Plaintiff realleges, reaffirms and incorporates by reference all allegations in paragraphs 1-34.

36. By going off-script and violently shoving Plaintiff, who was only a crew member, to the ground, Defendant MOXLEY demonstrated a substantial lack of concern for whether a severe injury would result to a production crew member at the event.

37. Defendant MOXLEY's actions demonstrated a clear and reckless disregard for the health and safety of the production staff, Plaintiff.

38. In taking no precautions or preventative measures to protect production staff, Defendant AEW's actions likewise show a reckless disregard for the safety of production staff which goes beyond simple inadvertence.

39. Due to Defendants' gross negligence, Plaintiff suffered injuries; the extent of which is currently unknown as his medical treatment continues.

WHEREFORE, Plaintiff now claims judgment for whatever amount he is found to be entitled including but not limited to Exemplary Damages, plus court costs, attorney fees and interest from the date of filing this Complaint.

COUNT V
PREMISES LIABILITY
AS TO DEFENDANT AEW

Plaintiff DISPENSA adds Count V as follows:

40. Plaintiff realleges, reaffirms and incorporates by reference all allegations in paragraphs 1-39.

41. Plaintiff was a business invitee of Defendant AEW as a contracted production crew member.

42. Defendant AEW hosted and controlled the event, premises, and performance at all relevant times.

43. Defendant AEW owed Plaintiff a duty to ensure the premise was reasonably safe for him to perform his contracted duties.

44. Defendant AEW failed to control Defendant MOXLEY and the premise which was a proximate cause of Plaintiff's injuries as described above.

WHEREFORE, Plaintiff now claims judgment for whatever amount he is found to be entitled, plus court costs, attorney fees and interest from the date of filing this Complaint.

COUNT VI
RESPONDEAT SUPERIOR (VICARIOUS LIABILITY)
AS TO DEFENDANT AEW

Plaintiff DISPENSA adds Count VI as follows:

45. Plaintiff realleges, reaffirms and incorporates by reference all allegations in paragraphs 1-44.

46. Defendant MOXLEY was in the employment, agency and/or contractually controlled by Defendant AEW at all relevant times or was otherwise under Defendant AEW's control and direction.

47. When Defendant MOXLEY committed the acts described *supra* during an AEW event, Defendant MOXLEY was in the course and scope of his employment, agency or contract with Defendant AEW or was otherwise under the control and direction of Defendant AEW.

48. Accordingly, Defendant AEW is vicariously liable for negligent torts committed while under employment, agency and contract via the Doctrine of *Respondeat Superior*.

WHEREFORE, Plaintiff now claims judgment for whatever amount he is found to be entitled, plus court costs, attorney fees and interest from the date of filing this Complaint.

COUNT VII
DAMAGES

Plaintiff DISPENSA adds Count VII as follows:

49. Plaintiff realleges, reaffirms and incorporates by reference all allegations in paragraphs 1-48.

50. As a direct and proximate result of DEFENDANTS' negligence and assault Plaintiff incurred damages, including, but not limited to:

- A. Medical expenses;
- B. Disability;
- C. Permanent and serious disfigurement;
- D. Wage Loss and Lost Earnings Capacity
- E. Pain and suffering;
- F. Exemplary damages for mental and emotional anxiety, humiliation and/or indignity;
- G. Diminution in business reputation and opportunities
- H. Other economic and noneconomic damages not yet known.
- I. All other damages available under Michigan Law

WHEREFORE, Plaintiff demands judgment against Defendants in an amount to be determined by the jury, together with costs, interest, and such other relief as this Court deems just and proper.

DATED: May 30, 2025

Respectfully submitted,

RAITT LAW, PLLC



BY: _____
THOMAS W. JAMES (P68563)
Attorney for Plaintiff